BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268–0001

MAILING ONLINE SERVICE	Docket No. MC98–1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS GARVEY TO INTERROGATORY OF
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS–T1—45)

The United States Postal Service hereby provides the response of witness

Garvey to the following interrogatory of the Office of the Consumer Advocate: OCA/

USPS–T1—45, filed on October 13, 1998. Interrogatory OCA/USPS–T1—46 was

redirected to witness Plunkett.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Kenneth N. Hollies
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October 23, 1998

OCA/USPS-T1-45. Please refer to Tr. 2/182 and Tr. 4/842. At page 182 you state, "The system software defines batches based upon page count, paper size, bindery options, spot color options and proofing options. Also, *non-merge jobs* are defined as separate batches, as are fax-back and mail-back proofing requests." At page 842 you calculate the number of possible job type batches by taking account of paper size, plex options, bindery options, and color options.

a.   *Has the computer code you provided at page 182 changed? If so, please provide a copy of the current code.*

b.   Is each individual non-merge job treated as a separate job type batch? If so, why and how is this accomplished? If not, please describe how these jobs are batched and state whether these jobs are batched with mail-merge jobs.

c.   Is each individual fax-back job treated as a separate job type batch? If so, why and how is this accomplished? If not, please describe how these jobs are batched and state whether these jobs are batched with mail-merge jobs.

d.   Is each individual mail-back job treated as a separate job type batch? If so, why and how is this accomplished? If not, please describe how these jobs are batched and state whether these jobs are batched with mail-merge jobs.

e.   Please confirm that there are 48 possible page-count options. If you do not confirm, please state how many page-count options there are.

f.   Please confirm that for mail-merge jobs there are 42 X 48 = 2016 possible page-count/job-type batches. If you do not confirm, please state the correct number of possible mail-merge batches and show its derivation.

g.   *Please confirm that the number of possible non-merge batches is* unknowable, since each such job is treated as a separate batch. If you do not confirm, please state the correct number of possible non-merge batches and show its derivation.

h.   Please confirm that the number of possible fax-back batches is unknowable, since each such job is treated as a separate batch. If you do not confirm, please state the correct number of possible fax-back batches and show its derivation.

i.   Please confirm that the number of possible mail-back batches is unknowable, since each such job is treated as a separate batch. If you do not confirm, please state the correct number of possible mail-back batches and show its derivation.

RESPONSE:

a.   According to the system developer, the code has not changed.

b.   Yes, at the present time all non-merge jobs are treated as separate

batches. The current MOL system is an enhanced version of the original

proof of concept software used for the operational test. The initial phases

of system development have focused on simplicity and consistent

operability. Consequently only mail-merge jobs are currently combined

into co-mingled batches; all others are handled as separate batches.

Current (and future) system development is focused on improved

functionality including the capability to combine all like documents into co-

mingled batches.

c.   Yes, at the present time all fax-back jobs are treated as separate batches.

See my response to (b) above.

d.   Yes, at the present time all mail-back jobs are treated as separate

batches. See my response to (b) above.

e.   Confirmed.

f.   Not confirmed. The system which has been implemented for the market

test has different finishing options than the operational test system. Due

to these differences the possible job-type batches are[1]:

Letter & legal   2 possible plex options – simplex or duplex
            x 3 possible binding options – stapled, not stapled or tape binding
             6
            x 2 possible paper sizes – letter or legal
             12
            x 5 possible color options – black, red, green, blue, magenta
             60

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[1] For technical reasons, neither the 11x17 paper choice nor the saddlestitching finishing option will be available at the launch of the market test. They are expected to be reintroduced shortly after the market test begins.
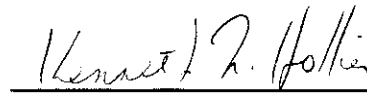
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Newsletter 1 possible plex option – duplex

     <u>x 2</u> possible binding options – stapled or not stapled
      2

     <u>x 1</u> possible paper size – newsletter (11"x17")
      2

     <u>x 1</u> possible color option – black
      2

This is a total of 62 job-type batches. The page-count can be equal to or less than 48. Therefore the possible page-count/job-type batches equals 62 x 48 = 3000

g. Confirmed that at present the number of possible non-merge batches is unknowable. It is known however that the number will be equal to the total number of non-merge jobs submitted and processed.

h. Confirmed that at present the number of possible fax-back batches is unknowable. It is known however that the actual number will be equal to the total number of fax-back requests submitted and processed.

i. Confirmed that at present the number of possible mail-back batches is unknowable. It is known however that the actual number will be equal to the total number of mail-back requests submitted and processed.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Kenneth N. Hollies

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